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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

JAN 11 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

)
)
) CC Docket No. 92-77
) Phase I

PETITION FOR RECONSIDERATION OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) submits this Petition For Reconsideration of certain elements of the Order released in this docket.¹

I. INTRODUCTION

The Commission has required AT&T to : "(1) educate its cardholders to check payphone signage and to use 0+ access only at phones identified as presubscribed to AT&T; (2) to provide clear and accurate access code dialing instructions on every proprietary card issued; and (3) make its 800 access code number easier to use."² The Commission also has directed AT&T to file a compliance plan within 30 days from the release of the Order. Authority to review and approve the compliance plan has been delegated to the Common Carrier Bureau.³ SWBT herein requests that AT&T also be required to inform its proprietary card customers that calls can be completed on an 0+ basis whenever the customers hear the announcement of AT&T or a Local Exchange Carrier (LEC).

¹ Report and Order and Request for Supplemental Comment (Order), CC Docket No. 92-77, released November 6, 1992.

² Id., para. 57.

³ Id., fn. 91.

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II. AT&T'S CONSUMER EDUCATION REQUIREMENTS

As SWBT has discussed previously in this docket, local and intraLATA calls charged to AT&T proprietary cards can continue to be made on an 0+ basis from virtually every phone in the nation, whether the phone is presubscribed to AT&T or to some other carrier. This key point should be clearly explained in AT&T's consumer educational material. How a consumer should dial a call is determined not only by whether the telephone is presubscribed to AT&T but also by whether such calls are within the local and long distance (intraLATA) service areas of LECs. AT&T's educational material must clearly address this issue to minimize consumer confusion.

On December 23, 1992, AT&T filed the non-confidential portion of its compliance plan.⁴ A copy of this material is attached. The material submitted by AT&T does not state that local and intraLATA calls can be charged to AT&T proprietary cards on an 0+ basis from virtually every phone in the nation.⁵ The educational material merely instructs consumers to check the signage on the telephone. If AT&T is identified as the long distance carrier, consumers are instructed to dial "0" + the area

⁴ Letter from Ronald B. Gramaglia, AT&T Division Manager Federal Regulation, to Donna Searcy, Secretary FCC. -AT&T also submitted four additional pages of the plan, seeking confidential treatment, to Greg Vogt, FCC Chief of the Tariff Division.

⁵ AT&T Direct Case, DA 91-1583, January 30, 1992. AT&T has approximately 1100 mutual honoring agreements with Local Exchange Carriers across the country. SWBT is one of the 1100 companies having mutual honoring agreements with AT&T. SWBT also continues to be willing to enter into mutual honoring agreements with other IXCs that may issue 0+ calling cards.

code + number, and then listen for a tone followed by "AT&T". If consumers hear an announcement identifying AT&T as the carrier, they are instructed to enter their calling call number. If they do not hear the AT&T announcement, however, they are advised to hang-up and use an access code dialing procedure.

Further, if consumers do not see AT&T signage on the telephone, they are directed to use an access code dialing procedure from the start. If problems are still encountered, consumers are instructed to dial an 800 telephone number.

Such instructions fail to indicate that it is not necessary to check for signage when placing most local and intraLATA calls. Such instructions also fail to state that an announcement from a LEC or AT&T makes it possible to continue with call processing. SWBT believes these instructions, as they relate to local and intraLATA calls, may be misleading and confusing to consumers.

In most instances, when consumers wish to place local or intraLATA calls on an 0+ basis using AT&T proprietary cards, they will not need to check telephone signage, follow access code dialing procedures, call an 800 telephone number, or listen for only an AT&T announcement. Consumers may simply dial 0+ and complete the call over a LEC's network. Moreover, on the vast majority of local and intraLATA calls dialed on an 0+ basis, the announcement heard by a consumer will be that of a LEC and not that of an interexchange carrier operator service provider. Consumers wishing to charge local and intraLATA calls to AT&T proprietary

cards would thus be mislead if they followed AT&T's educational materials.

There is a simple solution to this problem. AT&T should inform its proprietary card customers that calls can be completed on an 0+ basis whenever they hear the announcement of AT&T or a LEC. If these instructions are included in the AT&T's educational materials, consumer confusion and inconvenience will be minimized.

III. CONCLUSION

For the reasons stated above, SWBT believes that AT&T's consumer educational materials should clearly point out that calls handled by LECs can continue to be made on an 0+ basis from virtually every phone in the nation. The Commission should require AT&T to notify customers that they may complete calls using AT&T proprietary cards whenever they hear the announcement identifying AT&T or a LEC as the carrier handling the call.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By



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January 11, 1993



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December 23, 1992

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DEC 23 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Docket No. 92-77, Compliance Plan

Dear Ms. Searcy:

Attached for the record is the non-confidential portion of AT&T's compliance plan as required in the FCC Order Number 92-77. This plan supercedes prior submissions dated November 23, December 15 and December 17, 1992.

AT&T is filing four additional pages of this plan with Mr. Greg Vogt, Chief of the Tariff Division, for which AT&T is seeking confidential treatment because of the proprietary information they contain.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Gramaglia', is written over the 'Sincerely,' text.

Attachment

cc: G. Vogt
C. Boothby
B. Esbin

AT&T

Dialing Instructions Communication Plan

FCC Review

CC Docket No. 92 - 77

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DEC 23 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Our Objectives

- ✓ **Comply with the requirements outlined in the FCC Report & Order.**
- ✓ **Provide consumers with accurate procedures for placing calling card calls.**

AT&T Assumptions

- ✓ We MUST provide some form of communication to existing proprietary cardholders -- which includes a *permanent* reminder of these instructions (sticker for back of card).
- ✓ We MUST change all marketing material issued to new card holders to reflect new instructions -- including plastic.

Changes to our 800 Number Access Code

- ✓ A new menu structure has been developed,
- ✓ New prompts have been written and recorded,
- ✓ *The Result:*
 - placing a call using this form of access is now *more direct* and *easier to use*.

1 800 CALL ATT

Target Audience

Dialing Instructions Education

All cardholders will receive updated, accurate dialing instructions:

- ✓ Consumer Card
- ✓ Universal Card
- ✓ Business Card

Message Delivery

Will include a mix of:

- ▶ **Direct Mail**
- ▶ **Bill Inserts**
- ▶ **Bill Messages**
- ▶ **Direct Account Management**
 - **account team presentations to customers**
- ▶ **Public Relations**
- ▶ **Customer Contact Channel Methods and Procedures**
- ▶ **Print Advertising**
- ▶ **Television / Radio**

The Message

What the Overall Plan will communicate:

Look at the phone.

If you see a sign indicating AT&T is the long distance carrier, dial "0" + area code + number, then listen for a tone followed by "AT&T." If you hear it, you're on the AT&T Network and you can go ahead and enter your calling card number. If you don't hear "AT&T" after the tone, hang up and dial

10 + ATT + 0
(that's 10 + 288 + 0)
+ AREA CODE + NUMBER

If you don't see a sign indicating AT&T is the long distance carrier, just dial 10 + ATT + 0 right from the start.

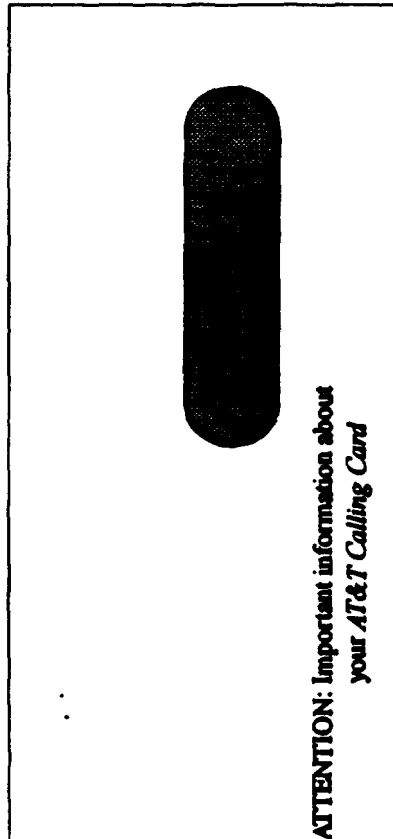
If you still can't get through, don't worry. Just dial our toll-free number 1-800-XXX-XXXX to complete your call.


Existing Cardholders

Card Type	Form of Communication
Consumer Card	Direct Mail -- letter with sticker
Universal Card	Bill insert [with sticker] VISA does not allow card issuers to affix stickers to their cards.
Corporate Card	<i>Large Business Accounts:</i> customer presentation and bill inserts with sticker. <i>Small/Medium Business Accounts:</i> Direct Mail -- letter with sticker <i>Corporate Link Accounts:</i> AMEX bill messages

Communications Plan

Letter and Envelope





285 North Maple Avenue
Basking Ridge, NJ 07020

Mr. John Sample
Sample Company
123 Sample Road
Anytown, USA 12345-6789

Dear Mr. Sample:

First, look at the phone.

If you see a sign indicating AT&T is the long distance carrier, dial "0" + area code + number, then listen for a tone followed by "AT&T." If you hear it, you're on the AT&T Network and you can go ahead and enter your calling card number. If you don't hear "AT&T" after the tone, hang up and dial

10 + ATT + 0
(that's 10 + 283 + 0)
+ AREA CODE + NUMBER *

If you don't see a sign on the phone indicating AT&T is the long distance carrier, just dial 10+ATT+0 right from the start.

If you still can't get through, don't worry. Just dial our toll-free number 1 800 XXX-XXXX to complete your call!

For your convenience, we've enclosed a sticker for the back of your calling card with complete dialing instructions. Please place the sticker on the back of your AT&T Calling Card **.

Thank you

* For international calls, dial 10 + ATT + 01 before country code, city code and number.
** Place the sticker before the magnetic stripe on the back of your AT&T Calling Card.

Communications Plan

New Cardholders

For all Markets:

New Calling Cards: all markets will begin efforts to use newly designed 'plates' for the back of the card. The new plates incorporate updated, accurate dialing instructions.

Support Material: new card orders will come complete with support material containing updated, accurate dialing instructions.

New Calling Card Back

If you move, or for Customer Service: In U.S. 1 800 CALL ATT; Outside U.S. Collect 816 654-8000

WHEN IN THE U.S.

LISTEN at instructions on phone. If AT&T is the long distance carrier.*

ENTER 0 + Area Code + Phone No.

(International: 01 + Country Code + City Code + Phone No.)

LISTEN for "AT&T".* Then:

ENTER Card No. + PIN

* If AT&T is not the long distance carrier, or if you don't hear "AT&T" during the LISTEN step, hang up, dial 1 0 + A T T + 0 (10+288+0) + Area Code + Phone No. Then follow ENTER step.

LISTEN Call 1-800-XXX-XXXX.

Communications Plan

Additional Support

- ✓ **Television:** Current/future spots will contain LOOK-first message LISTEN for the AT&T logo, DIAL 10ATT+0
- ✓ **Radio:** same as above
- ✓ **Print Advertising:** future calling card access print advertising will contain updated, accurate dialing instructions.
- ✓ **Public Relations:** will work with consumer advocates and reporters to deliver dialing instruction update. Exploring the the feasibility of in-language assistance.
- ✓ **Customer Contact Channels:** all channel methods & procedures will be revised to incorporate updated instructions.

Communications Plan

Timeline

Nov 15.....	New 800 no. menu and prompts
Nov 23 - Dec 23.....	Presentation of Plan to FCC
During 1Q93.....Jan/Feb.....	Begin direct mail to existing cardholders
.....	All relevant marketing materials incorporate updated, accurate instructions
Mar.....	New Calling Card back with updated, accurate instructions

CERTIFICATE OF SERVICE

I, Joe Meier, hereby certify that the foregoing "Petition for Reconsideration of Southwestern Bell Telephone Company" in Docket No. 92-77, Phase I, has been served this 11th day of January, 1993 to the Parties of Record.


Joe Meier

January 11, 1993

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